

JAMIE LEONARD vs. ST. CHARLES COUNTY POLICE DEPARTMENT, et al  
Deposition of JAMIE D. LEONARD, JR. taken on 8/22/19

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

Deposition of  
JAMIE D. LEONARD, JR.,  
on Behalf of Defendants

August 22, 2019

Reported by  
Laura Lynn Murphy  
CCR NO. 764, RMR  
for  
MASUGA COURT REPORTING  
2033 Hiawatha Avenue  
St. Louis, Missouri 63143-1215  
(314) 781-1447

JAMIE LEONARD vs. ST. CHARLES COUNTY POLICE DEPARTMENT, et al  
 Deposition of JAMIE D. LEONARD, JR. taken on 8/22/19

<p style="text-align: center;">Page 58</p> <p>1     Q. -- fully and completely.      2     A. Yeah.      3     Q. You had said that you can no longer play softball      4 or golf. Did you play that prior to the injury?      5     A. I did, yeah. I played on -- well, I played golf.      6 I mean, I'd go to the driving range three, four days a week,      7 you know, and then golf once a week season, during the      8 season at least. When the money was good, I was golfing      9 three, four days a week because you'd invite your clients.      10 You know, that was --      11    Softball, it wasn't as competitive. You know, it      12 was a men's league. But still, you know, I don't want to      13 catch a drive at third base and take the chance and say,      14 "Oh, well, that's how you lost your eye, dummy. You went      15 out on the softball field when you had one eye. You lost      16 your eye." You know, you never know.      17    So hockey, I played hockey for 14 years. I don't      18 know if I told you that, but can't play hockey anymore. If      19 I do, I got to put on a double cage if I even think about      20 playing hockey. But I don't want to do anything to, you      21 know, lose that -- lose my good eye, man.      22    Q. So as far as the medical expenses that you      23 incurred, do you have an estimate of how much you paid in      24 medical bills as a result of the injury to your eye?      25    A. It's all in the -- it's all in the report. My</p>	<p style="text-align: center;">Page 60</p> <p>1     A. I weigh 310 pounds I think right now.      2     Q. Would that have been about your approximate      3 height and weight back in '17?      4     A. Might have been a little lighter.      5     Q. Back in July of 2017?      6     A. Maybe, like, 10 pounds lighter, maybe. I don't      7 -- I really don't know, but I think I was working out more      8 consistently then so.      9     Q. Have you had any prior altercations with police      10 or law enforcement?      11    A. No.      12    Q. Other than this lawsuit, have you ever filed any      13 other kind of civil lawsuit?      14    A. I have not filed a lawsuit, no.      15    Q. Have you ever been the defendant in a lawsuit?      16    Have you ever been sued?      17    A. One real estate, it was a real estate civil suit.      18    Somebody sued my -- I was the broker and I was sued civilly      19 through -- the seller sued me because their house was      20 robbed.      21    It was out in Ferguson, Missouri. I don't why we      22 took the listing but we took it. All the copper got      23 stripped, and they sued me for negligence saying we left the      24 door unlocked. So I ended up settling that case.      25    Q. So did you end up paying the plaintiff in that?</p>
<p style="text-align: center;">Page 59</p> <p>1     attorney has taken care of that I think he said.      2     Q. Is there any further treatment for your eye      3 planned for the future?      4     A. Yeah, I have to -- my eye is sagging. Dr.      5 Custer, I was -- I'm going to meet with him actually next      6 month. And they're going to decide to either do another      7 surgery to lift my eye socket to lift my eyelid or they're      8 going to try to add more to the prosthetic to open the eye      9 up more. They don't know yet.      10    So he said, "At this point, you probably will      11 need future surgery." But I won't know until I meet him and      12 really have the discussion.      13    Q. And so other than what you described there, any      14 other future treatment that you're aware of?      15    A. No, just consistently meeting with the eye      16 doctor.      17    Q. You said you were offered a job as a bouncer; is      18 that correct?      19    A. Yeah, yeah, I was, yeah, yeah, just to work the      20 door and it's a buddy of mine, yeah, yeah.      21    Q. So just out of curiosity, how tall are you?      22    A. I am 6 8.      23    Q. All right.      24    A. Yeah.      25    Q. How much do you weigh?</p>	<p style="text-align: center;">Page 61</p> <p>1     A. I did actually.      2     WITNESS: Am I safe to say that you were my --      3     MR. DONNER: Yeah, you can mention. I      4 represented him --      5     WITNESS: Yeah.      6     MR. DONNER: -- in that transact --      7     WITNESS: Yeah.      8     MR. DONNER: -- in that suit.      9     WITNESS: He helped me settle it, yeah. Yeah, I      10 did.      11    Q. (By Mr. Heffner) So I think that that about      12 does it for me. What I'd like to do is maybe take a quick      13 recess, let me go back, look at my notes --      14    A. Uh-huh.      15    Q. -- and discuss it with Bryan and --      16    A. Okay.      17    MR. HEFFNER: So we can go off the record.      18     (Brief recess.)      19    Q. (By Mr. Heffner) So we're back on the record. I      20 just have a few more questions and then we'll be done with      21 this. So you know that you talked about marijuana use. Had      22 you used any marijuana on July 19, 2017?      23    A. July 22 or July 19?      24    Q. July 19 so the morning of the incident in      25 Wentzville.</p>

16 (Pages 58 to 61)